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November 21, 2016

**By ECF To:**

Honorable Richard J. Sullivan  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Vincent Bertolino v. City of New York, et al.; 15 Civ. 7327 (RJS)

Dear Judge Sullivan:

I am counsel for Plaintiff in this action. By Order dated November 10, 2016 Your Honor extended until November 23, 2016 Plaintiff's deadline to file his application for attorney's fees and costs, in light of the settlement in principle concerning the attorney's fees and costs that had been reached. I write to respectfully request an additional extension of two weeks, until December 7, 2016, for Plaintiff to file his application for attorney's fees and costs. Opposing counsel, Ms. Jacobs, consents to this request. The reason for this request is that an unexpected issue has arisen concerning the language in the attorney's fees and costs settlement paperwork, that I am attempting to work out with one of Ms. Jacobs' colleagues in the New York City Law Department in another case that is in a similar posture (Ms. Jacobs has informed me that she will handle the paperwork in this case identically once that issue is resolved). It is my hope that that issue will be taken care of in the coming days, or sometime next week, but it is doubtful that it will be able to be addressed prior to Thanksgiving, and it may require some back and forth next week as well.

I thank the Court for its consideration in this matter.

Respectfully submitted,

/S/

Jeffrey A. Rothman

cc: Elissa Jacobs, Esq. (by ECF)